# LEGAL SERVICES CORPORATION

## Grants Management System
## Request for Proposal
## *Appendix I – LSC Business Workflows*

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# I. LSC BUSINESS WORKFLOWS

The purpose of this appendix is to provide vendors additional details about key business workflows to be incorporated into a grants management system (GMS). Responding vendors should leverage these workflows to provide their responses to the detailed requirements outlined in the separate Excel spreadsheet (*reference the instructions in the RFP*). In addition, a summary of key acronyms and terminologies used in this document and the detailed requirements spreadsheet can be found in the RFP.

## A. LSC Grants/Awards (Outgoing)

As previously mentioned, LSC is the single largest funder of civil legal aid for low-income Americans in the nation. As such, a key requirement for the grants management system is to be able to manage the process associated with being a funder and distributing funds to the various grantees. While there are nuances and terminology differences associated with each of LSC's grants and programs, overall they have similar requirements related to the need to have an application established within the GMS, have applicants submit responses, and to have the LSC review of those applications follow an established workflow. In addition, grantees will need to submit progress reports in order to remain compliant with the terms of the awards. Additional information about LSC's grants and programs can be found on the LSC website: http://grants.lsc.gov/.

### 1. Field Grants

LSC currently has 134 grantees and this number has remained static for the last few years. The largest grant offered by LSC is the Competition (Field) grant, which typically is awarded for a three-year cycle. Approximately one-third of the grantees are in *competition* each year which requires an extensive review of their program; the remaining two-thirds are in the *renewal* process (i.e., in year two or three of their award cycle). Year Two and Three of the award cycle are considered the renewal period. The Renewal application process is not as rigorous as the Competition application. During the renewal cycle, grantees are providing updates on any changes since the competitive application process.

LSC proposes to award grants to programs in order to serve every county in the United States; the District of Columbia; the U.S. territories (American Samoa, the Commonwealth of Puerto Rico, the U.S. Virgin Islands, and Guam); and an area that includes the Commonwealth of the Northern Mariana Islands, the Federated States of Micronesia, the Republic of the Marshall Islands, and the Republic of Palau. As such, geographical service areas are defined, that may or may not be part of a state. In addition, there may be different grantees for each of these service areas or they can be served by the same grantee. LSC has defined three *types* of service areas associated with field grants:

1. Basic Field – *General*: provide legal services to the general low-income population living in a specific geographical area.

2. Basic Field – *Native American*: provide legal services to Native Americans living in a specific geographical area, related to their status as Native Americans.
3. Basic Field – *Migrant*: provide legal services to Migrant Farmworkers living in a specific geographical area, related to their status as Migrant Farmworkers.

Competition and Renewal grants are classified as follows:

- **Competition Grants – Standard**
  - Applies to new applicants or existing grantees that have not had a program quality visit (PQV) within the last two years and/or are not in the renewal process.
  - This category may also apply to existing grantees that have had a PQV conducted within the last two years, but LSC has received notice that another applicant is bidding on the same service area – therefore all applicants must go through the competition process.
- **Competition Grants – Post PQV (Program Quality Visit)**
  - Applies to existing grantees that have completed a PQV within the last two years.
  - These visits result in Tier 1 Recommendations – which are included in the application. The grantee must provide a status of these activities and does not need to respond to all of the questions within the Competition (standard) application.
  - This pool typically represents one-third of the post-PQV grantees.
- **Renewal Grants – Standard**
  - Applies to existing grantees that are in year one or two of their grant cycle and have not had a PQV in the last two years.
- **Renewal Grants – Post PQV (Program Quality Visit)**
  - Applies to existing grantees that are in year one or two of their grant cycle and have had a PQV in the last two years.
  - This pool typically represents two-thirds of the post-PQV grantees.

## 1.1. Maintenance of Service Areas

**Current Workflow and Description**

In accordance with LSC's multi-year funding policy, competitive grant applications are only accepted for specific service areas. Service areas are typically defined by a geographic area. The selected GMS will need to be able to track the different service areas, including when the service area will next be in competition, to facilitate the competitive grant application process.

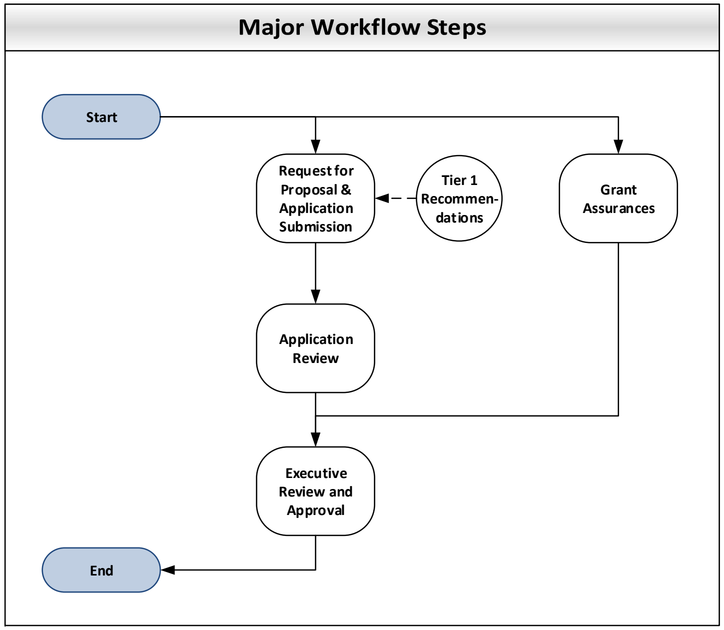
Additional information about LSC's service areas and the description of the geographic area for each service area can be found on LSC's website: [http://grants.lsc.gov/about/where-we-fund](http://grants.lsc.gov/about/where-we-fund).

**Detailed Requirements**
Please reference the following categories within the Excel spreadsheet for the detailed requirements associated with this process:

- Grants Management Lifecycle/Service Areas

## 1.2. Competition Grants – Standard and Post-PQV

**Current Workflow and Description**




**<u>Request for Proposal (RFP) & Application Submission</u>**

The RFP issued by LSC represents the commencement of the grants management lifecycle. The RFP is updated on a yearly basis and posted for applicants. In conjunction, Evaluation Guides are updated that provide guidelines to LSC reviewers on how to evaluate and score the applications (e.g., what qualifies as an 'excellent', 'sufficient', or 'weak' response). Different Evaluation Guides are utilized based on the reviewer's role (e.g., the guide used by OPP differs from the OCE fiscal compliance analysts, which differs from the OCE program counsels). Once the RFP is posted, the application process commences. All applicants must complete the registration process prior to completing an application. The first and mandatory component of the application that must be completed is the Notice of Intent to Compete (NIC). A NIC is completed for each service area in which an applicant intends to apply. Once the NIC is approved by LSC, then the applicant has access to view and complete the full application. If a NIC is received by an applicant for a service area associated with an existing post-PQV grantee, that post-PQV grantee must now follow the standard competition process, instead of the post-PQV process (reference the *Multi-Applicant Competition or New Applicant* process below).

**Tier 1 Recommendations**

Tier 1 recommendations are specific findings and recommendations that impact a program's quality and/or performance. Tier 1 recommendations are identified during site visits (i.e., program quality visits) performed by OPP. Programs/grantees are required to report on their progress against these recommendations as part of the post-PQV grant application process. Therefore, any Tier 1 recommendations identified during site visits must be pulled into the specific application for the grantee. Tier 1 recommendations are only incorporated into post-PQV grant applications (both competition and renewals).

**Application Review**

LSC reviewers may be manually or automatically (per established criteria) assigned to applications. Once an application is submitted by the applicant, LSC reviewers will commence their online review via the GMS and leverage the Evaluation Guide to assist in the scoring. Application review must be routed within LSC based on an established workflow (e.g., OPP staff reviews must be complete before review by the OPP Director, OCE fiscal compliance analyst review must be complete prior to review by the OCE Director). However, there must be flexibility in the system to "bypass" this requirement if necessary (e.g., the LSC staff reviewer is unavailable but application review by the Director must be completed). OPP staff are the primary reviewers, with OCE staff providing their reviews on the compliance and fiscal assessment portions of the application. Based on established criteria and weighting, applications are then scored once LSC reviews are completed. However, the scoring associated with the OPP and OCE reviews are not combined. Another key component to the application review is the determination of whether special grant conditions (SGCs) need to be applied (e.g., limiting the award to a one-year period instead of three years).

In preparation for the executive review, LSC staff are responsible for creating a Program Planning and Assessment (PPA) form. The PPA represents the reviewer's official summary/analysis of the application. The PPA is populated with grantee data from the system (e.g., offices, staffing) and the reviewer's original responses regarding the application. After the system-generated PPA is created, the reviewer will modify the document (in Word) to include additional context and analysis based on their knowledge of the program, and update the PPA with additional narrative.  The reviewer's original responses that were captured in the GMS are not updated to reflect these changes; however, the GMS should maintain a link to this revised document so it can be referenced within the system.

**Grant Assurances**

As a requirement for receiving funding from LSC, applicants/grantees must certify compliance with the funding guidelines.  Therefore, as part of the application process, applicants must sign and submit the Grant Assurance and LSC Certification forms.  The LSC Certification form is completed by applicants twice per year – the first is in preparation for funding decisions and the second is when the award package is accepted.

**Executive Review and Approval**

After review by staff members and directors, applications are routed to the LSC President for review.  The LSC President is responsible for the approval of any applications, including any special grant conditions.

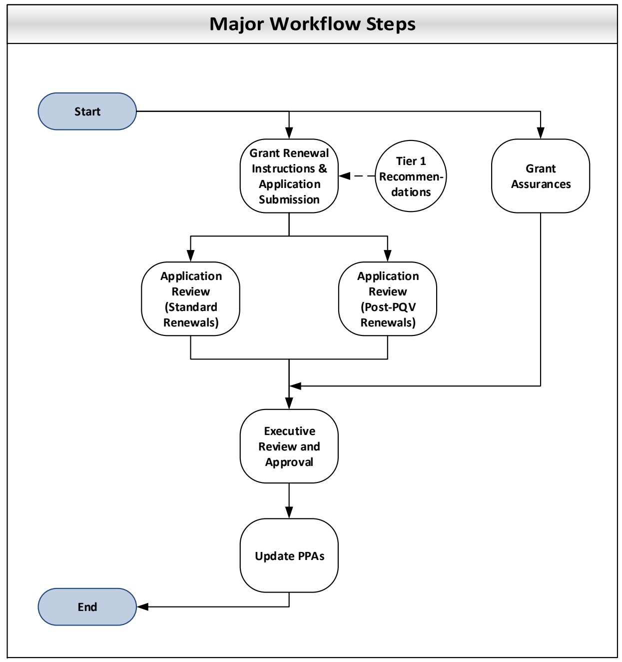
**Detailed Requirements**

Please reference the following categories within the Excel spreadsheet for the detailed requirements associated with this process:

- Grants Management Lifecycle

## 1.3. Renewal Grants – Standard and Post-PQV

### Current Workflow and Description




**<u>Grant Renewal Instructions & Application Submission</u>**

The application process for renewals is similar to the competition process (*outlined above*), although the application form differs. In addition, there is no Evaluation Guide for renewals, as grantees are responding to any updates in their process since their last competition application.

**<u>Tier 1 Recommendations</u>**

Reference the *Competition* section above.

**<u>Application Review (Standard & Post-PQV Renewals)</u>**
Similar to the Competition Review process (*reference section above*), LSC reviewers will enter their scores, comments, etc. associated with an application. OPP and OCE scores are tracked separately. Renewal applications are also routed for review and approval based on an established workflow. Note – the review process for standard and post-PQV renewals are similar, with differences related to the LSC staff members involved in the review/approval process.

As part of the review process, a Summary Report is prepared that outlines any significant changes within the grantee organization, staffing information, and any findings. Similar to the PPA form, the Summary Report should be initially populated with data from the system, with a link to the revised document maintained.

**<u>Grant Assurances</u>**
Reference the *Competition* section above.

**<u>Executive Review and Approval</u>**
Reference the *Competition* section above.

**<u>Update PPAs</u>**
Similar to the competition process, PPAs are also generated from the system and updated (reference section above). However, this document is not part of the review process (as the Summary Report is utilized), and is therefore typically updated after award decisions are finalized.

**Detailed Requirements**
Please reference the following categories within the Excel spreadsheet for the detailed requirements associated with this process:

- Grants Management Lifecycle

## 2. Multi-Applicant Competition or New Applicant

**Current Workflow and Description**
The Competition process previously outlined assumes that only one applicant is competing for a service area – which is the typical scenario. However, there are instances where there are multiple applicants competing for a service area which would trigger this scenario. In addition, if there is only one applicant competing for a service area not currently covered, then that will also trigger this process. On average, there are only one to two instances per year of the multi-applicant or new applicant scenario.

The application and review process for this process is similar to the Competition Grants (*outlined above*), with the primary difference being that in addition to LSC reviewers, there are non-LSC individuals involved in the review process. Information is still routed to the LSC President for final review and approval.

**Detailed Requirements**
Please reference the following categories within the Excel spreadsheet for the detailed requirements associated with this process:

- Grants Management Lifecycle

## 3. Disaster Relief Emergency Grants

**Current Workflow and Description**
This program is for LSC grantees in federally declared disaster areas that are seeking financial assistance in order to mitigate damage sustained (e.g., to buildings, to equipment) and who have experienced a surge in demand for legal services as the result of a disaster. Disaster Relief Emergency Grants have similar key processes as Competition Grants – application creation, application submission, and review/approval of applications. However, applications for disaster grants are not a yearly process. There is no specified timeframe for submission, although it should be within a reasonable timeframe after a presidential declaration of a disaster. In addition, only current LSC grantees are permitted to apply for disaster grants. As part of the grant requirements, grantees must submit progress reports that summarize how funds were spent.

**Detailed Requirements**
Please reference the following categories within the Excel spreadsheet for the detailed requirements associated with this process:

- Grants Management Lifecycle
- Grantee Progress Reporting

## 4. Loan Repayment Assistance Program (LRAP)

**Current Workflow and Description**

The Loan Repayment Assistance Program (LRAP) provides forgivable loans to attorneys employed by LSC-funded programs to help them repay law school debt. Attorneys who are selected to participate receive loans for up to three years, as long as they remain eligible (e.g., stay employed by the LSC-funded program) and LSC funding is available.

The application and review process is similar to the grants processes previously outlined. Although for LRAPs, the award affiliation is with an individual and not an organization (grantee). The loan is for three years. If private attorneys have completed their first or second year, and wish to participate in years two or three, a Renewal Application form is required.

**Detailed Requirements**

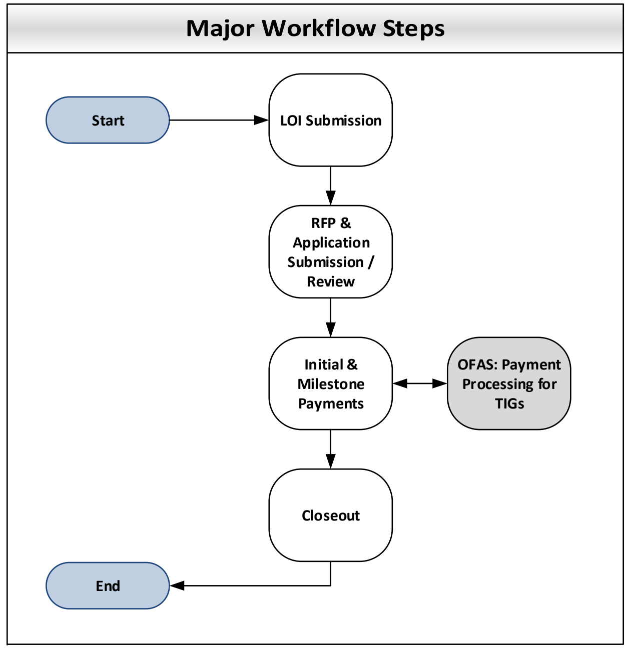
Please reference the following categories within the Excel spreadsheet for the detailed requirements associated with this process:

- Grants Management Lifecycle
- Grants Management Lifecycle / LRAP (note – any specific nuances associated with LRAP are outlined here; however, basic requirements are similar to that of field grants)

## 5. Technology Initiative Grants (TIG)

**Current Workflow and Description**

Technology Initiative Grants (TIGs) represents grants offered only to existing LSC grantees to improve efficiency through technology. In addition, grantees may be awarded multiple TIGs that run concurrently. Unlike field grants, payments for TIGs are not done on a monthly basis, but based on completion of established milestones. A TIG award can span over a period of years, with payments issued as milestones are achieved.




**LOI Submission**

The Letter of Intent (LOI) outlines the conditions associated with the Technology Initiative Grant (TIG) program. It outlines LSC's requirements, eligibility requirements, funding availability, etc. The LOI is revised yearly and made available to all LSC grantees. Interested grantees/programs must submit a LOI (summarizes the proposed project, goals, objectives, activities, timeline, budget, etc.) and eligibility is confirmed by the LSC TIG Team. Once eligibility is confirmed, the LOI review process commences – at this time, reviewers are making a recommendation on whether to invite the grantee for the application process. Similar to Competition grants, there is an Evaluation Guide that provides guidelines on how to score the LOI. In addition, there are canned responses available for the reviewer to utilize. The review and approval process follows an established workflow (similar to the application review process associated with competition grants) and emails are generated informing the "invited" programs for when the RFP will be posted.

**Application Submission / Review**

For TIGs, the application submission and review process is similar to competition grants. Applications are available to programs in which the LOI was approved by the LSC President. As a component of the application, applicants must submit a proposed budget. Ideally, this information will be maintained and managed within the grants management system.

Once a grant is approved by the LSC President, additional refinements are made to the final payment schedule (with the defined milestones) and the final budget. System validations must exist to ensure that changes do not exceed the amount approved by the LSC President, and other payment criteria are met. Once this is finalized, the award package is created and disseminated to the grantee. Grantees must then submit the required acceptance information to LSC.

**Initial & Milestone Payments**

Once the award package has been approved and all information received, the initial payment is sent to the grantee. For new TIG recipients, it is mandatory that they attend the annual TIG conference. The cost of the conference is covered by LSC and included in the initial payment. Therefore, the system needs to be able to maintain the original award amounts and payment schedule, but generate/track the revised payment schedule that reflects this adjustment and other payment revisions.

After the initial payment, any subsequent payments are based on fulfilling the requirements of each defined milestone. Within the GMS, grantees are responsible for submitting progress reports indicating their fulfillment of a milestone. LSC staff will then review to confirm compliance, and recommendations on whether the grantee has met the required milestones is documented. The Recommendation document is routed for review and approval. Once fulfillment of the milestone is approved by the OPP Director, this triggers the payment to be processed.

For the initial and milestone payments, including any payment adjustments (e.g., TIG conference), the GMS needs to have the ability to produce a file with the payment information that can then be uploaded into the SunSystems financial package. In addition, the GMS needs to have the ability to receive updates from SunSystems to track when the payment has been processed and sent to the grantee. Reference the *Payment Processing* workflow below for additional details.

**Closeout**

At some point, the TIG project and/or funding is completed or the grant is terminated.

A closeout is considered "***normal***" when the grantee has completed their milestones and/or the project associated with the TIG has been completed. As such, the following steps are performed:

- A Final Report and Final Budget are submitted by the grantee. If there are differences between the actual vs. initial budget information, the grantee must provide comments.

- If funds need to be returned (i.e., funds not fully spent), a Refund Memo is created to reduce the grant award. The memo is reviewed by the applicable LSC staff, then routed to the LSC President for approval and signature. The grants system is updated with the new information (amendment to the grant).
- OFAS is notified of the change.

A grantee's funding may be ***terminated*** if they are non-responsive to the milestone reporting requirements. If a grantee is terminated, they cannot be awarded another TIG for three years, although there is an appeal process. The following steps are performed for terminations:

- A 60-day notice is issued; the grantee has 30 days to respond.
- If non-responsive, a 30-day (and final) notice is issued. If the grantee is still non-responsive, then the award will be suspended.
- If the award is suspended, a Termination Memo (for internal LSC use) is drafted. The memo is reviewed by the applicable LSC staff. Once approved by the LSC President, the Termination Memo is routed to OFAS to ensure any future payments are suspended.
- The system is updated with the termination status.

**Detailed Requirements**
Please reference the following categories within the Excel spreadsheet for the detailed requirements associated with this process:

- Grants Management Lifecycle
- Grants Management Lifecycle / TIGs (note – any specific nuances associated with TIGs are outlined here; however, basic requirements are similar to that of field grants)
- Grantee Progress Reporting

## 6. Pro Bono Innovation Fund (PBIF)

**Current Workflow and Description**
Established in 2014, the Pro Bono Innovation Fund provides grants for existing LSC grantees that address three core goals: (1) engage more lawyers in pro bono service; (2) address gaps in legal services; and (3) address persistent challenges in pro bono delivery systems.

The workflow associated with the PBIF is similar to TIGs, where there is a LOI and application process. In addition, grantees must submit progress reports to LSC.

**Detailed Requirements**
Please reference the following categories within the Excel spreadsheet for the detailed requirements associated with this process:

- Grants Management Lifecycle
- Grants Management Lifecycle / TIGs (note – any specific nuances associated with the PBIF are outlined here; however, basic requirements are similar to that of field grants that is outlined in the *Grants Management Lifecycle* section)
- Grantee Progress Reporting

## 7. Subgrant Reviews

**Current Workflow and Description**
Programs/grantees may elect to allocate a portion of their funding (e.g., from field grants, TIGs, PBIFs) to another organization (e.g., bar association, private attorneys, legal aid firms) to conduct programmatic work related to the grantee's delivery of legal services. As such, the program must obtain approval from LSC for the use of a subgrantee. Programs must complete a Subgrant Application and Subgrant Agreement for each subgrantee to be utilized. Applications and draft agreements are typically submitted as part of the grant application process, but a fully executed Subgrant Agreement must also be submitted at least 45 days in advance of the Agreement's start date. Approvals of subgrants are similar to awards in that an approval workflow is utilized and programs are notified of the decision.

Subgrant Applications are typically approved for one year or less. As such, grantees will typically submit Subgrant Application forms during both the competition and renewal grant award cycles. Subgrant Applications for PBIFs and TIGs are submitted during their application processes.

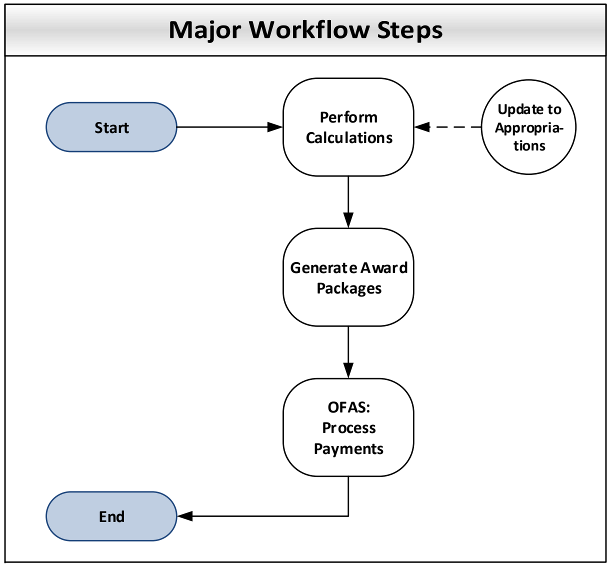
**Detailed Requirements**
Please reference the following categories within the Excel spreadsheet for the detailed requirements associated with this process:

- Grants Management Lifecycle
- Grants Management Lifecycle / Subgrants (note – any specific nuances are outlined here; however, basic requirements are similar to that of the application process associated with field grants that is outlined in the *Grants Management Lifecycle* section)

## B. Grant Award Calculations and Award Packages (Competition and Renewal Grants)

**Current Workflow and Description**
Fund calculations are based on appropriations that are typically performed annually. Appropriations are based on the government's fiscal year, although LSC funds on a calendar year. If appropriations have not been finalized, funding decisions may initially be based on continuing resolutions.

The award calculation process is only applicable to approved Competition and Renewal grants; they do not apply to TIG, Disaster Relief grants, LRAP or the Pro Bono Innovation Fund.




**<u>Perform Calculations</u>**
Ideally, grant award calculations are performed using final appropriation amounts dictated by Congress. If not available, continuing resolutions (CRs) are used. A continuing resolution is a type of appropriations legislation that sets aside funds for specific federal government departments, agencies and programs. The continuing resolution extends funding until the regular appropriation bills are passed. The LSC President gives permission to calculate grant amounts based on the CRs in effect.

Congress dictates specific appropriations related to field competition, and they are broken out into the following areas: General, Migrant, and Native American – i.e., the service areas. In addition, on top of the appropriation and/or CR amounts, there are instances where additional funds can be distributed across all service areas (e.g., prior year funds not granted out). Utilizing census information, appropriation amounts, and any leftover funds, complex calculations are performed to determine the Per Poor Person (PPP) funding amount. This information is used to calculate the funding amounts per service area. Note – calculations are currently done in Excel, so the selected software would need to have similar capabilities.

Once the total award amount is calculated, the payment amounts are determined. The grant amount is divided by 12, with a double payment applied in the first month (January) as there are no payments issued in November.

As previously mentioned, often these calculations are performed using the continuing resolutions. Once the final appropriations are identified, the calculations will need to be re-performed. The payment schedule will also be adjusted to account for the new award amount, any amounts already distributed to the grantee, and the remaining months of the year (noting that payments are still skipped for November). The selected software must have the ability to track the history of all of the calculations performed and the impact to the grantees. All payment information is uploaded (via csv) into the SunSystems financial software package. The ability for the selected GMS to integrate with the financial system is critical.

**<u>Generate Award Package</u>**

Once grant awards are calculated and verified, award letters are disseminated to the grantees. There are two different boilerplate templates used for the award letters – for Competition and Renewals. Award letters are then populated with specific grantee information – e.g., grantee name and address, applicable service areas, grant award amounts, funding period, special grant conditions. Currently, the award package consists of the following components:

- Award letter – customized for the grantee.
- Instructions – on what documents need to be signed and returned to LSC, and how to upload the documents via the grants management system.
- Acceptance of Grant Award (AGA) letter – this serves as the grantee's acceptance of the award and is signed and returned to LSC.
- Grant Award Schedule (GAS) – this is the grantee-specific payment schedule for distributing the award funds.
- Individualized Grant Condition – if applicable, this outlines any special grant conditions (e.g., grantee is only being funded for one year, instead of three).

Once award packages are generated and approved by LSC staff, they are posted on a secure location via the grants management system for grantees to access. Grantees will review the packages and submit back the required approval forms.

**Process Payments**

Once award packages are accepted by the grantee, the payment process commences.

Throughout the year, there may be revisions to a grantee's monthly payment amounts (payment put on hold due to compliance issues, deduction to reclaim funds, deduction for magazine subscription, etc.). In this scenario, the system must maintain the original award amounts and payment schedule, but generate/track the revised payment schedule that reflects any adjustments.

Reference the *Payment Processing* workflow below for additional details.

**Detailed Requirements**

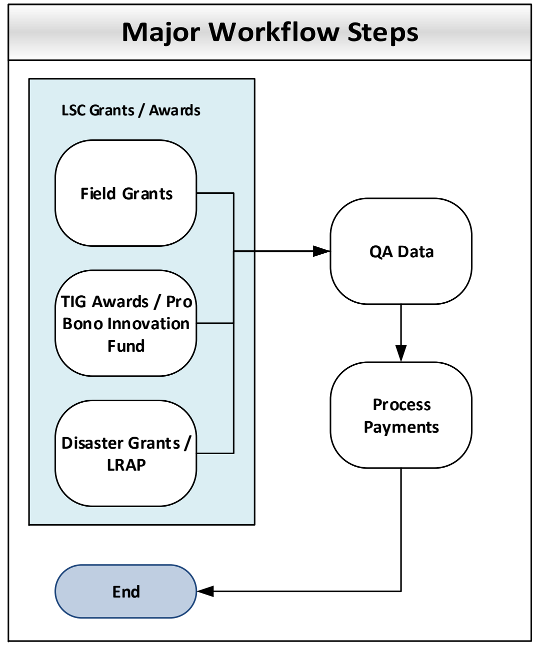
Please reference the following categories within the Excel spreadsheet for the detailed requirements associated with this process:

- Grant Award Calculations
- Award Package
- Payment Processing

## C. Payment Processing (All Grants and Awards)

**Current Workflow and Description**

Payments are processed via LSC's Office of Financial & Administrative Services (OFAS) and managed in the Infor SunSystems financial management system. Overall, the payment process is similar for all grants/programs managed by LSC – payment amount information from the GMS needs to be interfaced to the financial system (e.g., through and API or csv file upload). Differences are around the frequency in which payments are sent. For example, payments for competition and renewal grants are sent the first business day of the month and TIG payments are based on milestone completion. In addition, some payments may overlap where it includes both competition grant funding and disaster grant funding; however, each are separately designated during payment processing.




**QA Data**

Information sent by the GMS is reviewed by the OFAS team prior to uploading and posting the data to the financial system. The selected GMS needs to provide reports that can be leveraged by OFAS for their QA/review process.

**Process Payments**

Currently, a csv file is produced from the grants management system that provides the necessary information to be uploaded into the SunSystems financial application.

## D. LSC Grants (Incoming)

**Current Workflow and Description**
LSC is primarily a funder based on appropriations from federal funds. However, LSC has recently received funds from other sources that need to be tracked. The system should support the ability to track these grants, payments received against those grants, and manage LSC's obligations to issue progress reports to the grant funders.

**Detailed Requirements**
Please reference the following categories within the Excel spreadsheet for the detailed requirements associated with this process:

- Grants Management (Incoming)

## E. Risk Assessments

**Current Workflow and Description**
Risk assessments are a key process utilized by both OPP and OCE in facilitating the decision on which programs to conduct an onsite assessment (site visit). Currently, OPP and OCE manage this process separately, but the goal is to have a unified system for tracking risks, with the flexibility for OPP and OCE to determine which particular risk factors (e.g., date of last site visit, change in executive leadership, number of complaints, grants/awards funded) should be leveraged for their particular calculations.

The review and update of risk factors is an ongoing process, with some information being tracked in the GMS and other data points being subjective that require data entry by LSC staff.

**Detailed Requirements**
Please reference the following categories within the Excel spreadsheet for the detailed requirements associated with this process:

- Risk Assessments

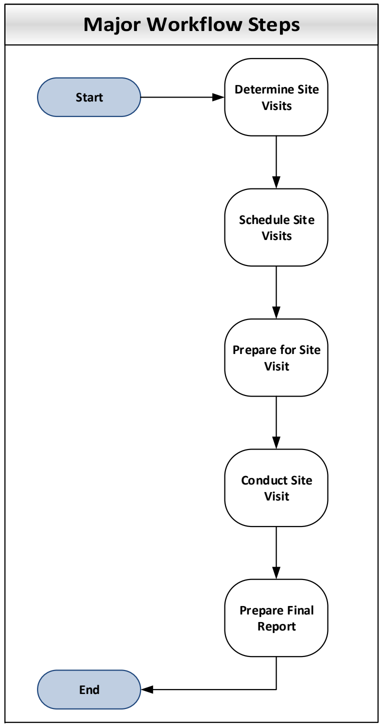
## F. OPP Onsite Assessments (Site Visits)

**Current Workflow and Description**

Onsite assessments (commonly referred to as "site visits") serve as a mechanism for identifying program strengths and areas of improvements. OPP conducts the following types of site visits:

- Program Quality Visit (PQV)
  - A PQV is an assessment of a program's delivery system (client intake process, private attorney involvement [PAI], use of technology to enhance internal operations, etc.).
- Program Engagement Visit (PEV)
  - These visits may be performed in order to: (a) become more familiar with the program's services and delivery system; (b) to follow-up on a prior visit recommendation; and/or (c) to address a specific concern about program operations.
- Technical Assistance Visit
  - These visits are conducted after LSC receives a request for technical assistance or LSC staff determine that technical assistance is warranted.
- Capability Assessment Visit (CAV)
  - These visits are typically performed when there are multiple applicants competing for a service area, thus requiring an onsite visit to further assess each applicant.

The overall process related to each of these site visits are similar, with differences associated with information/documents gathered and utilized for each. It is anticipated that the functionality associated with scheduling and tracking site visits will be maintained outside of the GMS. However, it will be critical for the selected GMS to integrate with Salesforce and Box in order to track key data points (e.g., date of site visit) and associated documentation.




**<u>Determine Site Visits</u>**

The determination of which programs to visit is based on the review and update of information in the Risk Assessment (*reference section above*). Tentative decisions are tracked in a Recommendation documented and routed for approval.

**<u>Schedule / Prepare for Site Visit</u>**

As previously mentioned, key tasks associated with scheduling and preparing for a site visit (e.g., assigning and notifying staff, grantee submission of required documents) will be managed outside of the GMS. However, within the selected GMS package, users should be able to link to the documents (in Box) and view the information.

There are also data elements – e.g., staff roster, offices listing – that are maintained in the grants management system, but will need to be updated by the grantee to reflect any recent changes.

**<u>Conduct Site Visit / Prepare Final Report</u>**

As part of the OPP site visits, various documentation is being produced by the LSC team – e.g., workplan, interview notes, draft report, final report. As previously noted, it is anticipated that these documents will reside in the Box document management software, but integration will be established with the selected GMS to access and view the information.

The final report outlines findings and recommendations for program improvement. Recommendations are classified as Tier 1 or Tier 2. Tier 1 recommendations have a significant impact on the program's quality and/or performance – as such, programs are required to report on progress against these recommendations (as part of the post-PQV grant application process). Therefore, the Tier 1 Recommendations from the PQV site visits must be pulled into the applicable grantee application.

Grantees have 30 days to submit any comments related to the report. As needed, the report may be modified to incorporate feedback from the grantee.

**Detailed Requirements**

Please reference the following categories within the Excel spreadsheet for the detailed requirements associated with this process:

- Risk Assessments
- Site Visits

## G. OCE Regulatory and Fiscal Oversight Visits (Site Visits)

**Current Workflow and Description**

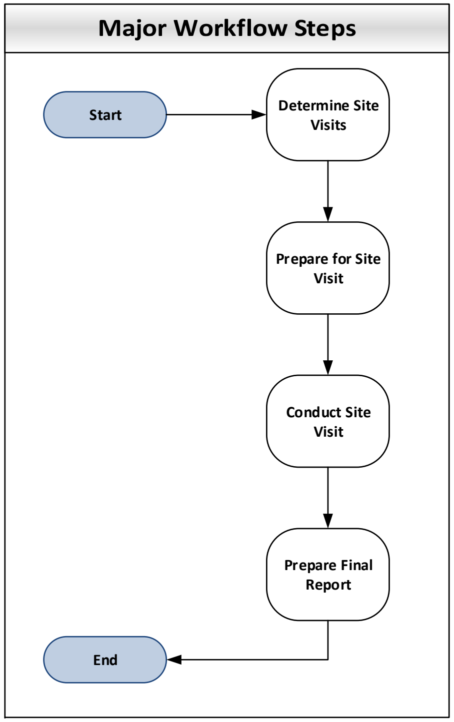
OCE evaluates the regulatory and fiscal compliance of programs. Conducting site visits is the primary method of assessing the programs. Site visits are conducted by the Program Counsels (attorneys) and/or the Fiscal Compliance Analysts (accountants).

OCE conducts the following types of site visits / reviews:

- Compliance Reviews (CR)
  - These visits focus on compliance with the LSC Act and regulations, and ensure accurate case service reporting. Examples of areas evaluated include the client intake process, case management practices, fiscal internal controls, and policies and procedures. In addition, the reviews include an assessment of the documentation within grantees' client cases. Note – OCE does not assess the quality of the legal work performed by the program/grantee.
  - For grantees that have been awarded a TIG, this review may also incorporate an evaluation of the grantee's use of TIG funds.

- Follow-up Reviews (FUR)
    - These reviews evaluate corrective actions and recommendations that were outlined in the Final Report of a prior OCE visit.
- Program Integrity Reviews
    - Program Integrity Reviews (1610's) are meant to enforce the following types of restrictions: entity-level restrictions and LSC fund restrictions.
    - The need for a program integrity review typically arises from one of the following:
        - OPP conducted a site visit and noted some issues that were referred to OCE.
        - OCE conducted a Compliance Review (CR) and given the identified findings, a recommendation is made to conduct a program integrity review.
    - A program integrity review may be done via an onsite visit or through a desk review. In a desk review, information is received from the grantee and based on a review of the data, a determination is made as to whether a site visit is needed.
- Fiscal Internal Control Reviews (Focused Fiscal Reviews)
    - These reviews focus on the fiscal compliance of a grantee. They are conducted by the Fiscal Compliance Analysts and may include an analysis of financial records, fiscal policies and procedures, and an evaluation of the internal controls of a program.
- Capability Assessments
    - Evaluates the ability for a program to comply with the LSC Act and regulations, as well as to assess the fiscal health of the applicant and whether the applicant has the ability to comply with the fiscal requirements associated with accepting LSC funding. This is typically performed in collaboration with OPP for new applicants.
- Complaint Investigation
    - Occurs when a complaint is received from a grantee's client, an OIG referral, an aggrieved employee or a denied applicant. While 150+ complaints may be received in a year, only a small percentage are legitimate and require follow-up, but not necessarily an investigation.
- Target Reviews
    - These reviews evaluate a specific area of a program (e.g., intake, private attorney involvement [PAI]). This may be a component of the CRs or the FURs.
- Technical Assistance Reviews (TAR)
    - During these visits, LSC provides case service reports (CSR), case management, policy review and implementation, and/or fiscal training to the program. These may occur from a request from the program, an issue that was reported from a previous site visit, or if the program has had a significant change in senior management, or has not been the subject of an OCE review for many years.

Similar to OPP site visits, it is anticipated that the functionality associated with scheduling and tracking site visits will be maintained outside of the GMS. However, it will be critical for the selected GMS to integrate with Salesforce and Box in order to track key data points (e.g., date of site visit) and associated documentation




**<u>Determine Site Visits</u>**

The determination of which programs to visit is similar to the OPP process outlined above – it begins with the review and update of information in the Risk Assessment (*reference section above*). The goal is to have a central repository for risk assessments, although OCE may select different criteria and weighting measures to be used for the risk calculations.

**Prepare for Site Visit**

The preparation for an OCE site visit is similar to that of OPP (outlined above). Various documentation is submitted by the grantee, as well as documentation is produced by OCE staff members. It is anticipated that the selected GMS will integrate with LSC's Box document management software to allow users to view the data within the GMS.

**Conduct Site Visit / Prepare Final Report**

Similar to the OPP site visit process (outlined above), various documentation is being produced by the LSC team – e.g., interview notes, individual reports from each team member, draft report, final report. As previously noted, it is anticipated that these documents will reside in the Box document management software, but integration will be established with the selected GMS to access and view the information.

The final report outlines any findings and recommendations, and the required corrective actions (RCAs). The RCAs represent items in which the program must report on their progress. The Team Lead is responsible for tracking any corrective actions and following up with the program.

**Detailed Requirements**

Please reference the following categories within the Excel spreadsheet for the detailed requirements associated with this process:

- Risk Assessments
- Site Visits

## H. Prior Approval of Purchases

**Current Workflow and Description**

As stipulated in regulations, grantees must obtain LSC approval for the following purchases:

- Capital Improvement and Personal Property
  - Entails the purchase or lease of personal property (e.g., furniture, copiers, case management system, computers, cars) exceeding $10,000 or investments in capital improvements exceeding $10,000.
  - LSC must follow-up with the grantee within 60 days of receipt of the request.
- Purchase of Real Property
- Sale of Property
  - Sale of property request must be received by LSC at least 30 days in advance of the sale of LSC financed real property.

Without LSC's approval, these costs may be questioned and disallowed by LSC. If a grantee uses a combination of funds from grantors and LSC's contribution for the purchase is less than $10,000, then no approval is needed.

LSC is looking to establish a central online portal in which these grantee requests, and any supporting documentation, can be submitted. These requests have specific timeframes in which LSC follow-up is required, and requests must be routed within LSC for approval.

**Detailed Requirements**
Please reference the following categories within the Excel spreadsheet for the detailed requirements associated with this process:

- Prior Approvals & Waivers

## I. Waivers

**Current Workflow and Description**
OCE may issue waivers (full or partial) to grantees for the following:

- Private Attorney Involvement (PAI) Waivers
    - Submitted by programs if they don't anticipate using the required amount of funds (of at least 12.5% of the basic field grant). Note – other funding sources can be used to meet this requirement.
    - Waivers must be submitted by the end of the grantee's fiscal year. By regulation, LSC must respond within 30 days of receiving the request.
    - If a waiver is approved, the grantee's required PAI expenditure of its basic field grant is reduced by the amount granted.
    - If a request is not approved and the grantee does not expend the required amount in the fiscal year, then the shortfall is carried over and added to the PAI requirement for the next fiscal year.

- Fund Balance / Deficit Waivers
    - LSC grantees whose annual audits report fund balances in excess of 10% of their total LSC funding are required to request a waiver in order to carry over the excess balance to the following year. Grantees must request waivers within 30 days after submission of their audited financial statements.
    - By regulation, LSC must respond within 45 days of receiving the request.
    - In the absence of a waiver, LSC is required to recover the excess fund balance.

The workflow/process associated with Waivers is similar to Prior Approvals of Purchases (*reference above*). LSC is looking to establish a central repository for grantees to submit requests that must be vetted by LSC staff.

**Detailed Requirements**
Please reference the following categories within the Excel spreadsheet for the detailed requirements associated with this process:

- Prior Approvals & Waivers

## J. Desk Reviews (Reviews of Grantee Financial Statements)

**Current Workflow and Description**
Desk reviews are an annual process that entails the review of grantees' audited financial statements (stored in the Box document management system). Reviews are conducted by the OCE Fiscal Compliance Analysts, with approval/sign-off by the OCE Director. Any findings are reported to the program, if deemed necessary. In addition, similar to site visits, issues (and resolutions) resulting from the desk review are identified and tracked. LSC is looking to automate components of this process and leverage automatic notifications to LSC staff and/or grantees.

**Detailed Requirements**
Please reference the following categories within the Excel spreadsheet for the detailed requirements associated with this process:

- Desk Reviews

## K. Questioned Costs

**Current Workflow and Description**
Questioned costs are typically referrals from the Office of Inspector General (OIG), or they may arise from site visits and desk reviews. Based on a review of grantee information, questioned costs are costs that are not allowable. As such, they are referred to OCE to determine if a regulation has been violated.

OCE will issue a Questioned Cost notice to the program that outlines the potential violation. Based on the program's response (in which they have 30 days), LSC will issue a Management Decision. Based on a monetary threshold, a program may elect to have the LSC President review and issue a final decision. If a questioned cost is identified, the outcome is either the program submitting a check to LSC or LSC will reduce future payments to the program.

**Detailed Requirements**
Please reference the following categories within the Excel spreadsheet for the detailed requirements associated with this process:

- Questioned Costs

## L. Complex Data Collection

**Current Workflow and Description**
LSC is responsible for collecting information about each grantee. Information is utilized to conduct statistical and trend analysis on the grantees. In addition, information is published for public review and accessible via LSC's website (http://grants.lsc.gov/rin/about-rin/grantee-data).

Grant Activity Reports (GAR) represent the primary mechanism for collecting grantee information. GAR submission is mandatory and the information gathered represents activity from the prior calendar year. Examples of data gathered include: information about closed cases, demographics of clients, grantee revenue and expense data, grantee staffing information, office locations, board members, educational meetings conducted by grantees, etc.

Currently, different systems/tools are utilize to capture information and data is not necessarily integrated. For example, grantees may provide demographic updates during the grant application process, but those revisions are not pulled into other tools utilized for reporting on grantee information. LSC needs a mechanism to gather this information and propagate the data to other areas of the system, as needed.

**Detailed Requirements**
Please reference the following categories within the Excel spreadsheet for the detailed requirements associated with this process:

- Complex Data Collection